

1 MELINDA HAAG (CABN 132612)
United States Attorney
2 JOANN M. SWANSON (CABN 88143)
Chief, Civil Division
3 VICTORIA R. CARRADERO (CABN 217885)
Assistant United States Attorney

4 450 Golden Gate Avenue, Box 36055
5 San Francisco, California 94102
Telephone: (415) 436-7181
6 Facsimile: (415) 436-6748
Email: victoria.carradero@usdoj.gov

7 Attorneys for Defendant

8 Denise Hulett (SBN 121553)
9 Claudia Center (SBN 158255)
LEGAL AID SOCIETY – EMPLOYMENT
10 LAW CENTER

11 180 Montgomery Street, Suite 600
San Francisco, CA 94104
12 Telephone: (415) 864-8848
Facsimile: (415) 593-0096
13 Email: dhulett@las-elc.org
center@las-elc.org

14
15 Wendy E. Musell (SBN 203507)
STEWART & MUSELL, LLP

16 351 California Street, Suite 700
San Francisco, CA 94104
17 Telephone: (415) 274-0700
Facsimile: (415) 520-0920
18 Email: wmusell@stewartandmusell.com

20
21 UNITED STATES DISTRICT COURT
22 NORTHERN DISTRICT OF CALIFORNIA
23 SAN FRANCISCO DIVISION

24 JULIE ROHLFS) NO. C 11-04915 JW
25 v. Plaintiff,) STIPULATION AND ~~PROPOSED~~ ORDER
ERIC HOLDER) RE: EXTENDED TIME FOR THE
Defendant.) DEPOSITIONS OF PLAINTIFF AND
FERNANDO DEL VALLE
Dept: Courtroom 9, 19th Floor
Judge: Honorable Chief Judge James Ware



1 Plaintiff Julie Rohlfs and Defendant Eric Holder hereby stipulate as follows:

2 The parties agree that Julie Rohlfs may be deposed for two (2) days, no more than seven (7) hours
3 of record time each day, for a total of 14 record hours. After that time, should Defendant contend that he
4 requires additional time for Plaintiff's deposition, he shall seek relief from the Court, after meeting and
5 conferring with Plaintiff.

6 The parties agree that Fernando Del Valle may be deposed for three days, allotted as follows: one-
7 and-a-half days or 10.5 record hours for Defendant and one day or seven (7) record hours for Plaintiff.
8 After that time, should either party contend that additional time is needed for Mr. Del Valle's deposition,
9 that party shall seek relief from the Court, after meeting and conferring with the other side.

10 **IT IS SO STIPULATED**

11 DATED: March 23, 2012

Denise Hulett
Claudia Center
Wendy Musell

14 _____/s/
15 Denise Hulett
16 Attorneys for Plaintiff

DATED: March 23, 2012

MELINDA HAAG
United States Attorney

18 _____/s/
19 Victoria R. Carradero
20 Assistant United States Attorney
Attorneys for Federal Defendant

21 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

22 The parties may exceed the time limits for deposition set forth in Fed. R. Civ. Proc. 34(d) as
follows:

23 Defendant may depose Plaintiff Julie Rohlfs for two (2) days, no more than seven (7) hours of
24 record time each day, for a total of 14 record hours. After that time, should Defendant contend that he
25 requires additional time for Plaintiff's deposition, he shall seek relief from the Court, after meeting and
26 conferring with Plaintiff.

1 Both parties may depose Fernando Del Valle over the course of three days, allotted as follows:
2 one-and-a-half days or 10.5 record hours for Defendant and one day or seven record hours for Plaintiff.
3 Should either party contend that additional time is needed for Mr. Del Valle's deposition, that party shall
4 seek relief from the Court, after meeting and conferring with the other side.

5
6 DATED: March 27, 2012
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28


The Honorable Chief Judge James Ware
United States District Court Judge